## NO. 2017-65533

MARCUS WILSON,	§	IN THE DISTRICT COURT OF
Plaintiff,	§	
	§	
V.	§	
	§	HARRIS COUNTY, TEXAS
TEICHMAN GROUP, LLC, T&T MARINE,	§	
INC., EXPRESS PROFESSIONAL	§	
SERVICES, INC. & OSG LIGHTERING, LLC	C, §	
Defendants.	§	190TH JUDICIAL DISTRICT

## TEICHMAN GROUP, LLC AND T&T MARINE, INC.'S RESPONSES TO PLAINTIFF'S REQUEST FOR DISCLOSURES

To: Plaintiff Marcus Wilson, by and through his attorney of record, Anthony G. Buzbee, The Buzbee Law Firm, 600 Travis, Suite 6850, Houston, Texas 77002.

Pursuant to the Texas Rules of Civil Procedure, Defendants serve the attached Disclosures.

Respectfully submitted,

SCHOUEST, BAMDAS, SOSHEA & BENMAIER, PLLC

/s/ Susan Noe Wilson

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ATTORNEYS FOR DEFENDANTS

TEICHMAN GROUP, LLC AND

T&T MARINE, INC.



## **CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2017, in accordance with the Texas Rules of Civil Procedure, a true and correct copy of the foregoing has been served on all known counsel of record.

/s/ Susan Noe Wilson
Susan Noe Wilson

## DEFENDANTS' RESPONSE TO PLAINTIFF'S REQUEST FOR DISCLOSURES

(a) the correct names of the parties to the lawsuit;

RESPONSE: Defendants have been correctly identified, but are not proper parties to this lawsuit

(b) the name, address, and telephone number of any potential parties;

RESPONSE: T&T Offshore, Inc.

c/o Susan Noe Wilson

Schouest, Bamdas, Soshea & BenMaier, PLLC

Houston, TX 77002

Express Services, Inc. d/b/a Express Employment Professionals

Texas City, TX 77591

Cheramie Marine LLC

Larose, LA 70373

(c) the legal theories and, in general, the factual bases of your claims or defenses;

RESPONSE: Plaintiff lacks the capacity and/or standing to sue as alleged in his Petition.

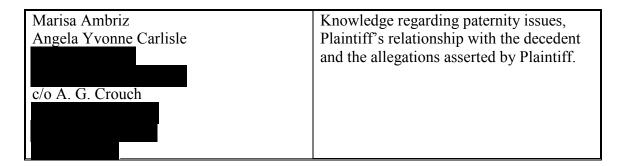
Defendants generally deny each of the material allegations made in Plaintiff's Petition and generally deny they committed any acts and/or omissions of negligence and/or proximately caused, contributorily cause, or were the producing cause in the acts, omissions, negligence, and/or conduct of fault with respect to Plaintiff's claims forming the basis of this lawsuit. If Plaintiff was damaged as alleged, such damages, if any, were proximately caused or occasioned by the acts, omissions or contributory negligence or other legal liability of third parties, their agents or representatives, or by the instrumentalities of third parties for whom Defendants are not liable. Plaintiff's damages, if any, were the result of an unavoidable accident. Defendants further assert that Plaintiff is not entitled to recover punitive damages as alleged. Please refer to Defendant's latest Answer, discovery responses and expert witness designation. Defendant will supplement as discovery continues.

(d) the amount and any method of calculating your alleged economic damages;

RESPONSE: Defendants are not seeking economic damages at this time. Defendants will supplement their response as required by the Rules.

(e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case; RESPONSE:

Marcus Wilson	Plaintiff
Anthony G. Buzbee	
The Buzbee Law Firm	
600 Travis, Suite 6850	
Houston, Texas 77002	
T&T Offshore, Inc.	Employees, witnesses and
c/o Susan Noe Wilson	representatives of T&T Offshore, Inc.
Schouest, Bamdas, Soshea & BenMaier	may have knowledge regarding the
	allegations asserted by Plaintiff
Houston, TX 77002	
Express Services, Inc.	Employees, witnesses and
	representatives of Express Services, Inc.
Texas City, TX 77591	may have knowledge regarding the
	allegations asserted by Plaintiff
Cheramie Marine LLC	Employees, witnesses and
	representatives of Cheramie Marine
Larose, LA 70373	LLC may have knowledge regarding
	the allegations asserted by Plaintiff
Ligthering, LLC	Employees, witnesses and
(formerly OSG Lightering LLC)	representatives of OSG Lightering,
	LLC may have knowledge regarding
	the allegations asserted by Plaintiff
Houston, Texas 77060	
T COLD.	
Jeff Tinney	Employee of T&T Offshore, Inc. may
c/o Robert Klawetter	have knowledge regarding the
M · D · I	allegations asserted by Plaintiff
Mario Ruiz, Jr.	Employee of OSG Lightering LLC may
c/o Michael Bell	have knowledge regarding the
M · P · G	allegations asserted by Plaintiff
Mario Ruiz, Sr.	Employee of OSG Lightering LLC may
c/o Michael Bell	have knowledge regarding the
	allegations asserted by Plaintiff



- (f) for any testifying expert:
  - (1) the expert's name, address, and telephone number;
  - (2) the subject matter on which the expert will testify;
  - (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to your control, documents reflecting such information
  - (4) if the expert is retained by, employed by, or otherwise subject to your control;
    - (a) All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony;
    - (b) the expert's current resume and bibliography;

RESPONSE: Defendants have not yet retained testifying experts.

(g) any discoverable indemnity and insuring agreements;

RESPONSE: Defendants are seeking indemnity from OSG Lightering LLC, Cheramie Marine LLC and/or Express Services, Inc.

(h) any discoverable settlement agreements:

RESPONSE: None, other than those already in possession of Plaintiff's counsel.

(i) any discoverable witness statements;

RESPONSE: None.

(j) any medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills:

RESPONSE: Not applicable.

(k) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

RESPONSE: Defendants will make copies of all records available to Plaintiff through its records service. If Plaintiff would like copies of specific records, Defendants ask that Plaintiff specifically identify those records and Defendants will have a copy service deliver same with an invoice. Alternatively, if Plaintiff wishes to review all records, Defendants will produce same for inspection at Defendants' counsel's office during business hours and upon reasonable notice.

(l) The name, address, and telephone number of any person who may be designated as a responsible third party.

RESPONSE: Express Services, Inc. d/b/a Express Employment Professionals

Texas City, TX 77591

Cheramie Marine LLC

Larose, LA 70373